

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
SEATTLE DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

**CHRISTINE REEVES, also known as
CHRISTINE NEWMAN,**

and

VCARE USA LLC,

Defendants.

I, SAMUEL SEETIN declare as follows:

1. I am 77 years old and I reside in Jonesboro, Georgia. In 2017, I became the victim of a fraudulent technology-support scheme.
2. I spent 23 years in the military. After I left the military, I worked in civil service for the Army for another 30 years.
3. In the summer of 2017, I was first contacted by a company claiming to be affiliated with Yahoo via email messages, which I disregarded at the time. A few days later, I received a phone call from a representative who claimed to work for, or be affiliated with, Yahoo. The representative told me his name was Paul Harris ("Mr. Harris") and he gave me his phone number 800-935-0687 (or 800-935-6017). Mr. Harris told me that all of my electronic devices, including my laptop, cell-phone, iPad, etc., had been infected with ransomware or malware, and that hundreds of hackers now had access to my personal information.

4. At one point during the phone call, I was suspicious that Mr. Harris was not a legitimate Yahoo employee. I told Mr. Harris that I would hang up and call them back to make sure that Mr. Harris's phone number was legitimate. The phone number Mr. Harris provided me with worked, so I truly thought I was speaking with a representative or employee of Yahoo. Mr. Harris also provided me with a web address (I do not remember the exact web address provided) which seemed to further confirm his legitimacy.

5. To let Mr. Harris assess the ransomware and malware corruption on my computer, I granted him remote access to the computer by clicking yes to an on-screen prompt. While Mr. Harris had access to my computer, he offered to install a security package that would prevent the virus that was infecting my electronic devices. Mr. Harris had already told me that my personal information was accessible to hundreds of hackers, and I agreed to purchase a security package from him just to be on the safe side. Mr. Harris first informed me that the cost for his services would be \$10,000. I protested that amount, and Mr. Harris lowered his price. Mr. Harris informed me that he would only accept payment via a bank transfer. I agreed to a bank transfer, and on July 14, 2017, I set up a one-time bank withdrawal from my Bank of America checking account. I paid \$6,999.99.

6. I felt uneasy about the transaction so I went to my local Bank of America shortly afterward to speak with a bank representative. I tried to stop the payment to Mr. Harris, but my Bank of America representative said that it was too late. My Bank of America representative was able to track my payment to a Bank of America in Seattle, Washington. It was only when I read the bank transfer statement that I discovered that my money had gone to a company called VCare, and not to Yahoo. The account listed on the bank transfer statement was VCare USA LLC at 15606 Golden Bar Drive, Gold Bar, Washington 98251.

7. I called Yahoo after reading the statement of my bank transfer. I spoke with a Yahoo representative, Sean March ("Mr. March"). Mr. March confirmed that VCare had no relationship with Yahoo, and informed me that the technical-support services that the VCare representative, Mr. Harris, had charged me for were, in reality, non-existent.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: 27 Feb 2019



Samuel Seetin